



January 21, 2014

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Peter Brostrom
Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-001

Re: Independent Technical Panel – Public Draft Report to the
Legislature on Urban Water Management Plan Demand
Management Measures Reporting and Requirements
(December 2013)

Dear Peter,

Please accept the Municipal Water District of Orange County's
(MWDOC) comments on the Independent Technical Panel Report:

1. Simplified Demand Management Measures

MWDOC supports the need to update the demand management measures listed in the urban water management planning act, as advancements in these measures have improved since the 2010 reporting. These measures provide a solid framework for advancing water use efficiency in California, especially in assisting agencies to meet the required 20% reduction in water use by 2020. The proposed simplified reporting on demand management measures is consistent with the 20% target based approach to demand management measures, while still providing sufficient information to document how the target is being met.

Clarification to the proposed language is needed regarding wholesalers. Reporting on water waste prevention ordinances and conservation pricing should not be required by wholesalers due to the lack of authority and indirect relationship with retail customers.

2. Electronic Filing of Urban Water Management Plans

MWDOC supports electronic filing of Urban Water Management Plan and use of standardized forms, so long as the requirements are provided to water suppliers well in advance of the plan due date. Also note that distinctions between retail and wholesale agencies are needed to avoid double counting of water supplies.

3. **Voluntary Reporting on Savings from Codes, Standards and Ordinances**

Including this reporting in urban water management plans will provide a better understanding of the water savings from codes, standards, and ordinances, and will be helpful in more accurately assessing future water demands. This assessment however is time-consuming, requires significant technical expertise, and includes many assumptions. If enacted it will be important for DWR to enlist support from water agencies to develop guidance that is appropriate and practical for various size water systems, and to build from methodologies already being used in the industry.

4. **Voluntary Inclusion of Energy Intensity in Urban Water Management Plans**

In light of the recent Order 13-12-011 Granting Petition and Opening Rulemaking issued by the California Public Utilities Commission on December 30, 2013, it seems premature for DWR to issue guidance on the water-energy nexus as it relates to joint water and energy program. The methodology the CPUC will use to authorize funding from energy efficiency programs for embedded energy savings has not been decided and could vary significantly from any guidance provided by DWR. This recommendation should be withdrawn from the ITP Report in recognition of the CPUC Rulemaking process.

Should you have any questions regarding these recommendations, please contact Joe Berg at (714) 593-5008.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Hunter", with a stylized, flowing script.

Robert J. Hunter